

Application Guidelines for Brownfields Job Training Grants Frequently Asked Questions (FAQ's)

<http://www.epa.gov/swerrims/docs/grants/epa-oswer-obcr-07-10.pdf>

Q. What is the grant application process in Fiscal Year (FY) 2008?

A. The process for applying for a job training grant consists of a single application package as discussed in the new Guidelines/Request for Applications (RFA). EPA is asking eligible applicants to demonstrate that they meet threshold eligibility requirements and to respond to evaluation criteria that will be used to rank proposals. Additionally, applicants are required to provide to EPA the pertinent attachments described in Section 4 of the Proposal Guidelines accessed through the weblink listed above as well as a Standard Form 424 (SF 424)/Application for Federal Assistance. The single application process for applying for the assessment, revolving loan fund, and cleanup grants are discussed in a separate set of guidelines from the job training program and are listed under a different CFDA number.

EPA has prepared guidelines on the application process for job training grants. The closing date and time for submission of application packages is October 19, 2007, 5:00 p.m. EDT. See the Request for Applications (RFA) announcement for submission details.

Q. How do I get help in understanding and responding to the FY 2008 grant announcement/guidelines?

*A. Applicants should review information on the EPA's brownfields website; <http://www.epa.gov/brownfields>. EPA Regional Brownfields staff will provide pre-application assistance to individual applicants regarding threshold eligibility requirements only. **Regional staff will not provide assistance to help applicants prepare their responses to ranking criteria.** Agency personnel will not review drafted applications. Electronic questions may be submitted to EPA's Office of Brownfields Cleanup and Land Revitalization to the attention of Joseph Bruss; bruss.joseph@epa.gov. Parties wishing to submit their questions via the United Postal Service should address their questions to: Attn: Mr. Joseph Bruss, U.S. Environmental Protection Agency; Office of Brownfields Cleanup and Land Revitalization, Room 2402, EPA West (MC-5105T); 1200 Pennsylvania Avenue, NW; Washington, DC 20460.*

Q. Who is eligible to apply for a brownfields job training grant?

*A. Applicants must be either eligible **governmental entities** as defined in CERCLA Section 104(k)(1) or eligible **nonprofit organizations** as defined in Public Law 106-107, the Federal Financial Assistance Management Improvement Act.*

Eligible governmental entities include a general purpose local unit of government; a land clearance authority or other quasi-governmental entity that operates under the supervision and control of, or as an agent of, a general purpose unit of government; a governmental entity created by a state legislature; a regional council or group of general purpose units of local government; a redevelopment agency that is chartered or otherwise sanctioned by a state; a

state; an Indian Tribe (other than in Alaska), or an Alaskan Native Regional Corporation and an Alaska Native Village Corporation as those terms are defined in the Alaska Native Claims Settlement Act (43 U.S.C. 1601 and following); and the Metlakatla Indian Community. EPA welcomes and encourages proposals from coalitions of such entities, but a single eligible entity must be identified as the legal recipient. Intertribal consortia, except consortia comprised of ineligible Alaskan tribes, are eligible to apply as well.

*Eligible nonprofit organizations include any corporation, trust, association, cooperative, or other organization that is operated mainly for scientific, educational, service, charitable, or similar purpose in the public interest; is not organized primarily for profit; and uses net proceeds to maintain, improve, or expand the operation of the organization. Workforce Investment Boards that meet these criteria may be eligible nonprofit organizations. Public and nonprofit private educational institutions are eligible to apply. However, nonprofit organizations described in Section 501(c)(4) of the Internal Revenue Code that engage in lobbying activities as defined in Section 3 of the Lobbying Disclosure Act of 1995 are **not** eligible to apply.*

For-profit or proprietary training organizations or trade schools are not eligible to apply. Nonprofit applicants must provide proof of their nonprofit 501(c)(3) status at the time the application is submitted.

Additionally, as stated in Section 3 of the Proposal Guidelines “Threshold Criteria,” eligible entities, as described above, must propose to serve a community who is receiving or has received brownfields assessment, revolving loan fund, or cleanup grant funding. For a complete listing of existing and past EPA brownfields grant-funded communities, please visit: <http://www.epa.gov/brownfields/plocat.htm>.

States and certain eligible Indian Tribes currently receiving CERCLA Section 128 funding may propose to serve any community within their jurisdiction where the State or Indian Tribe is conducting site-specific brownfields work (e.g. assessment or clean up activities) with State, Indian Tribal or Federal Section 128 funds.

Q. How have the job training guidelines changed since the FY 2007 competition?

A. For the Fiscal Year 2008 brownfields job training grant competition, please be aware that changes have been made in the application guidelines. The FY 2007 Job Training Guidelines are no longer valid.

*EPA has made some changes in the formatting of the guidelines. **Please pay careful attention to Section 4 of the Guidelines “Application and Submission Information.”** However, the threshold and ranking evaluation criteria remain largely the same as last year. Some of the ranking evaluation criteria have changed in minor ways and the Agency has assigned points to sub-factors under each ranking evaluation criterion.*

In FY 2008, applicants who received brownfields job training grants in or before FY 2006 are eligible to apply for funding. In the past, the EPA has limited eligibility to those applicants who received funding in the past two years. However, in FY 2008, this limitation has only been placed on applicants who received funding in the past year (FY 2007). A list of brownfields job training grants awarded in prior years can be found on the EPA's Office of Brownfields Cleanup and Land Revitalization website; <http://www.epa.gov/brownfields/pilot.htm#previous>

Please be aware that there is now a page limitation for both the "project description" and also the "attachments." The "project description," as referenced in Section 4 of the Guidelines includes responses to threshold criteria, responses to the evaluation criteria, and the cover letter. The "project description" must not exceed 17 pages in length.

The "attachments" now have a page limitation of 20 pages which includes the detailed itemized budget and narrative, references, the training program outline, the letter to the state or tribe, a milestones chart, documentation of non-profit status, and general support letters.

The complete application package, including the "project description" and the "attachments," therefore must not exceed 37 pages in length.

The Agency continues to require applicants under Section 4 of the Guidelines, "Attachments," to submit to EPA a copy of the letter they sent to the appropriate State or Tribal environmental program contact stipulating the applicant's plan to apply for an EPA brownfields job training grant. Additionally, applicants are asked to provide a list of references which will be verified during the evaluation process.

Under EPA Order 5700.7, "Environmental Results Under EPA Assistance Agreements," please be aware that the EPA will pay careful attention to an applicant's strategy and responses to the ranking evaluation criteria associated with achieving the required outcomes and outputs listed in Section 1 of the grant application guidelines. Ultimately, an applicant's responses to the ranking criteria must support EPA's strategic plan and the Government Performance and Results Act (GPRA) architecture.

Note: Please note that these are not the only changes which have occurred for FY 2007. For a more detailed listing, please refer to the brownfields job training guidelines at the website listed above.

Q. How will my application be evaluated?

A. Evaluation panels comprised of EPA employees and representatives of other federal agencies will assess how well the applications meet the evaluation criteria outlined in Section 5 of the Job Training Guidelines. There are two different types of criteria- "threshold criteria" and "ranking criteria." Threshold and ranking evaluation criteria are clearly indicated. If a response fails to meet any threshold criterion, listed in Section 3, the application will be disqualified from further consideration and the applicant will be notified. However, EPA Regional representatives may

seek clarification from an applicant regarding its response to a threshold criterion. EPA will not seek clarification of responses to any ranking evaluation criteria.

The evaluation panel will determine which applications have the potential to effectively use the limited funds EPA has available for awards. Scores on each ranking evaluation criterion will be totaled to determine the panel's recommended application rankings. EPA senior management will determine the final ranking of applications, taking into consideration the recommendations of the review panel. Additionally, EPA senior management will make final decisions on funding based upon the geographic distribution of funds throughout regions, urban versus non-urban distribution; distribution between applicants who have already received brownfields job training grants and those who have not; designation as an Enterprise Community, or Renewal Community, or Federal Empowerment Zone; population; whether the applicant is a federally recognized Indian tribe; and, whether the proposed project may assist in addressing environmental justice concerns (such as the disproportionate impact on, or presence of brownfields sites near, low-income and/or minority citizens).

Q. What is the maximum amount of money that an applicant may be awarded?

A. Under the Guidelines/RFA, an eligible applicant may apply for up to \$200,000 per job training grant. However, EPA reserves the right to fund successful proposals at lower amounts depending upon the availability of EPA funds, applicant's access to other funding sources, quality of the applicant's application, and community need. The project period for the brownfields job training grants is up to two years. Actual funding is dependent upon the availability of funds through the Federal budget process. Contact your Regional EPA Brownfields Job Training Coordinator for additional information. (A list of contacts can be found in the brownfields job training grant guidelines in Section 7.)

In FY08, EPA anticipates awarding approximately 12 – 13 job training grants.

Q. What is a brownfield site?

A. For the purpose of EPA's Brownfields Grant Program. A "Brownfield(s)" is defined in Section 101(39) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980. as amended, as:

"(...) real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant."

The law further defines the term "brownfield site" to include a site that "(...) is contaminated by a controlled substance; is contaminated by petroleum or a petroleum product excluded from the definition of 'hazardous substance'; or is mine-scarred land," as defined.

Q. How does an applicant ensure "non-duplication"?

A. Under Threshold Criterion 3, “[A]pplicants must demonstrate that the proposed job training project does not duplicate other federally funded hazardous waste management training programs in their target community.” (Brownfields Job Training Guidelines, 2008) For example, applicants must demonstrate that the proposed training project does not duplicate the National Institute of Environmental Health Sciences (NIEHS) hazardous waste management training programs in their target community. The NIEHS maintains a list of its worker training grantees on its website, <http://www.niehs.nih.gov/wetp>. Applicants may also provide other information to demonstrate non-duplication as well.

Q. How does an applicant ensure that all uses of EPA funds are eligible?

A. Applicants must carefully review the application guidelines to ensure that the activities included in their application are consistent with the brownfields job training grant guidelines. (Please see Appendix 1 in the job training guidelines “Prohibitions on Use of Funds” and page 3 “Eligible Use of Funds”) Please note that due to the administrative cost prohibition contained in the Brownfields law, indirect costs are not eligible under brownfields grants. EPA also encourages applicants to carefully review the OMB Cost Principles applicable to their organization (e.g. OMB Circular A-122 for non profit organizations).

Q. How do I submit my application?

A. Applications submitted in hard copy must be postmarked by the closing date and time for receipt of applications packages. Applications submitted through <http://www.Grants.gov> must be received through <http://www.Grants.gov> by October 19, 2007, 5:00 p.m. EDT.

*1. **Hard copy (paper) submission.** Applicants submitting hard copy applications must submit two complete packages including all of the documents identified in Section 4(B) of this announcement. The application submission to **Environmental Management Support, Inc. (contractor to EPA)** must be postmarked by the closing date and time for receipt of application packages. One complete package must be sent through regular mail, express mail, or courier to each of the following:*

*a. **Environmental Management Support, Inc. (contractor to EPA)** Attn: Mr. Don West, 8601 Georgia Avenue, Suite 500, Silver Spring, MD 20910, Phone 301-589-5318*

*b. The appropriate **EPA Regional Job Training Coordinator** listed in Section 7, Agency Contacts. Because of the unique situation involving U.S. mail screening, EPA highly recommends that applicants use an express mail option to transmit their application to the physical address of the EPA contact listed in Section 7, Agency Contacts.*

Q. Why does EPA discourage binders and color printing?

A. Each application is photocopied and distributed to members of the National Review Panel. Graphics, binders, colorful charts, etc., do not photocopy well and may distort information submitted for reproduction.

Q. If my organization is successful in obtaining EPA funding, can we charge the costs we incurred for a consultant to prepare our grant proposal?

A. No. Costs for preparing applications are an unallowable administrative cost.

Q. Will EPA fund pre-award costs?

A. Yes, to the extent allowed by 40 CFR 30.25(f)(1) and EPA policies implementing 40 CFR 31.23 and OMB Circular A-87 (now 2 CFR Part 225) Appendix B, Item 31. Successful applicants may incur pre-award costs up to 90 days before award without prior EPA approval provided:

- 1. The applicant includes the pre-award costs in its application;*
- 2. EPA agrees that the costs are eligible and allowable when the Agency approves the scope of work for the grant; and*
- 3. Any procurement contracts that are funded with pre-award costs comply with the competitive Procurement Standards at 40 CFR Part 30 or 40 CFR 31.36 as applicable.*

Proposal preparation costs are ineligible administrative costs.

*Please note an applicant must obtain prior EPA approval to incur pre-award costs more than 90 days before award. Also, **applicants incur pre-award at their own risk and EPA is under no obligation to reimburse applicants for pre-award costs if the applicant does not receive an award or if the amount of the award is less than the applicant anticipates.***

Q. How does an applicant ensure that all uses of EPA funds are eligible?

A. Applicants must carefully review the application guidelines to ensure that the activities included in their application are consistent with the brownfields job training grant guidelines. (Please see Appendix 1 in the job training guidelines “Prohibitions on Use of Funds” and page 3 “Eligible Use of Funds”) Please note that due to the administrative cost prohibition contained in the Brownfields law, indirect costs are not eligible under brownfields grants. EPA also encourages applicants to carefully review the OMB Cost Principles applicable to their organization (e.g. OMB Circular A-122 (now 2 CFR Part 230) for non profit organizations)

Q. Can a non-profit organization or eligible governmental applicant submit a joint application in partnership with a for-profit organization?

A. No. EPA awards Brownfield job training funds to a single eligible applicant. Successful applicants may contract for necessary goods and services with for-profit organizations under competitive procurement procedures as required by EPA grant regulations at 40 CFR Part 30 or 40 CFR Part 31, as applicable. Please refer to the Application Guidelines for Brownfields Job Training Grants, Section 2 E. “Can funding be used to acquire services or fund partnerships” for details.

Q. What are the important deadlines?

October 19, 2007

Applications must be received or postmarked by 5:00 p.m. EDT

Early-November 2007

Applicants who failed to meet “Threshold Criteria” are notified

January 2008

Announcement of Grant awards

Q. Where can I find information on Environmental Job Training Programs?

A. For more information on brownfields environmental job training programs, please visit the Hazardous Materials and Research Training Institute’s website at: <http://www.hmtri.org> or <http://brownfields-toolbox.org>.